

Term	Counter-Plaintiff's Proposed Construction	Counter-Defendants' Proposed Construction	Court's Final Construction
<p>1: "contoured surface(s)"</p> <p>U.S. Patent No. 8,272,756, Cls. 1, 3, 4, 5, 8, 9, 10, 14, 15</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>"surface[s] shaped to have a geometry beneficial for light reflection"</p> <p>Defendant's amended proposed (post-prelim): "surface[s] shaped to have a geometry beneficial for light <u>manipulation</u>"</p>	<p>Plain-and-ordinary meaning</p>
<p>2: "at least two of the plurality of protrusions are disposed outside each of the flat surface, the first contoured surface, and the second contoured surface of the channel"</p> <p>U.S. Patent No. 8,272,756, Cl. 5</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>"at least two of the plurality of protrusions are disposed on the back side of each of the flat surface, the first contoured surface, and the second contoured surface of the channel."</p>	<p>Plain-and-ordinary meaning.</p>

Term	Counter-Plaintiff's Proposed Construction	Counter-Defendants' Proposed Construction	Court's Final Construction
<p>3: "light emitting diode ("LED") package"</p> <p>U.S. Patent No. 8,348,479, Cls. 1, 13, 14, 20</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>"ordinary meaning (i.e., an "LED package" is a casing for one or more LED chips/dies, which both protects the chip(s) and allows them to be connected externally, e.g., to printed circuit board)."</p>	<p>Plain-and-ordinary meaning</p>
<p>4: "heat sink"</p> <p>U.S. Patent No. 8,348,479, Cls. 1, 13, 14, 19, 20; U.S. Patent No. 9,709,253, Cls. 1, 8, 16, 17, 22, 23, 30, 31, 32, 33, 34</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>"a heat-conductive device that reduces heat in the downlight module."</p>	<p>Plain-and-ordinary meaning</p>
<p>5: "formed integrally"</p> <p>U.S. Patent No. 8,348,479, Cl. 19; U.S. Patent No. 9,709,253, Cls.17, 32,</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>"formed as a single unit from the same material."</p>	<p>Plain-and-ordinary meaning</p>

Term	Counter-Plaintiff's Proposed Construction	Counter-Defendants' Proposed Construction	Court's Final Construction
<p>6: “[LED light source coupled to the] inner surface of the heat sink / heat sink includes an inner surface”</p> <p>U.S. Patent No. 9.709,253, Cls. 1</p> <p>Proposed by Counterclaim-Defendant</p>	<p>No construction necessary; plain and ordinary meaning.</p>	<p>Indefinite.</p>	<p>Not indefinite. Plain-and-ordinary meaning.</p>